

AB:LM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 841 and 846)

LINGWU CHEN and JIAYUN LIN,

No. 23-mj-113

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

MARK SANTIAGO, being duly sworn, deposes and states that he is a Task Force Officer with the Drug Enforcement Administration, duly appointed according to law and acting as such.

On or about February 1, 2023, within the Eastern District of New York and elsewhere, the defendants LINGWU CHEN and JIAYUN LIN did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing methamphetamine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841 and 846.

(Title 21, United States Code, Sections 841 and 846)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Task Force Officer with the Drug Enforcement Administration

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

(“DEA”) and have been involved in the investigation of numerous cases involving drug trafficking, including those involving the trafficking of methamphetamine. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. On or about February 1, 2023, law enforcements officers observed a White Mercedes Benz vehicle that committed various traffic infractions, including failing to stop at a stop sign at the intersection of 100th Street and 23rd Avenue in Queens, New York. LINGWU CHEN was driving the vehicle and JIAYUN LIN was sitting in the passenger seat of the vehicle.

3. After witnessing the traffic infractions, law enforcement officers proceeded to stop the vehicle. At that point, they observed that a Target store reusable bag had been thrown out of the passenger seat window of the vehicle. Officers immediately obtained the bag and observed that the Target store reusable bag contained a “Ziploc” bag with what appeared to be methamphetamine inside. LINGWU CHEN and JIAYUN LIN were then placed under arrest.

4. While attempting to place the defendants under arrest, law enforcement officers observed JIAYUN LIN trying to hide inside the vehicle’s front passenger door compartment a “Ziploc” bag with what appeared to be methamphetamine.

5. After a search incident to arrest, law enforcement officers found an additional “Ziploc” bag with what appeared to be crystal methamphetamine in one of JIAYUN LIN’s pockets. Officers also found another “Ziploc” bag with what appeared to be crystal methamphetamine inside a brown leather jacket on the rear passenger seat of the vehicle, and

which LINGWU CHEN had identified as his jacket.

6. A subsequent field test confirmed that these substances were in fact methamphetamine. The total approximate weight of the methamphetamine in the defendants' possession was 907 grams.

7. Furthermore, after a search incident to arrest, law enforcement officers found a glassine bag with approximately 8 grams of what appeared to be ketamine in one of LINGWU CHEN's pockets.

8. Law enforcement officers conducted an inventory search of the vehicle and found approximately \$3,900 cash inside the vehicle.

9. The total approximate weight of methamphetamine in the defendants' possession was 907 grams.

WHEREFORE, your deponent respectfully requests that the defendants LINGWU CHEN and JIAYUN LIN be dealt with according to law.

Mark Santiago

MARK SANTIAGO
Task Force Officer
Drug Enforcement Administration

Sworn to before me this
8th day of February, 2023

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HONORABLE TARYN A. MERKL
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK